

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	}	
	}	
Revision of Part 15 of the Commission's	}	
Rules Regarding Ultra-Wideband	}	ET Docket No. 98-153
Transmission Systems	}	

Reply Comments of Multispectral Solutions, Inc.

Multispectral Solutions, Inc. (MSSI) is pleased to submit these further reply comments in response to the Notice of Proposed Rule Making (NPRM), FCC 00-163, in the above referenced proceeding. These reply comments are specifically directed at the Reply Comments of Gary R. Olhoeft, Ph.D., dated 22 March 2001.

Dr. Olhoeft is indeed correct in his assertions that "geophysical electromagnetic broadband and ultra wideband (UWB) measurement devices" need to operate in frequency bands below 3.1 GHz in order to provide adequate penetration into the earth. However, this proceeding addresses only the *unlicensed* use of ultra wideband technology. To date, the geophysical community has not demonstrated the need to manufacture and sell such devices on an unlicensed basis. Indeed, the record in this proceeding has demonstrated just the opposite. U.S. Radar, for example, was granted a waiver to import and sell approximately 25 such systems per year in the U.S. over a ten year period. No information on these sales, if indeed any, was submitted into the record. It would then appear that the burden to license such devices would not materially affect the volume of sales anticipated by GPR manufacturers and equipment resellers. Furthermore, licensing of GPR devices in no way prevents the myriad of benefits alluded to by Dr. Olhoeft in his reply.

Respectfully submitted,



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